



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE

Small Business and Consumer Products Division
Small Coating and Printing Operations

DATE: April 7, 1993
TO: All Small Coating and Printing Operations Staff
FROM: Fred Lettice /s/ by FL
SUBJECT: Inactivation of Permit-to-Operate or Cancellation of Application Pursuant to Amended Rule 219

The September 11, 1992 amendment of Rule 219, Equipment Not Requiring a Written Permit Pursuant to Regulation II, exempts some equipment that previously required a permit-to-operate.

Two (2) modified sections in Rule 219 which may result in the inactivation of a permit or cancellation of an application are sections (h)(1) and (1)(15). Section (h)(1) exempts printing and related coating and/or laminating equipment and associated drying equipment not emitting more than three (3) pounds per day of VOC emissions; or not using more than six gallons per day of UV or plastisol type; or two gallons per day of any other graphic arts materials provided such drying equipment is exempt pursuant to section (b)(2). Remember that graphic arts materials include clean-up solvents.

Section (1)(15) exempts coating or laminating equipment operated outside control enclosures and associated drying equipment provided the daily VOC emissions are three (3) pounds per day or less; or provided that the coatings, adhesives, and/or organic solvents, including clean-up solvents, used with such equipment are six (6) gallons per day or less of UV type; one (1) gallon per day or less of solvent type; or three (3) gallons per day or less of water-reducible or water-based type, excluding water used as a reducer or for clean-up. Associated drying equipment must be exempt pursuant to section (b)(2). This exemption does not apply to control enclosures.

Section (b)(2) exempts boilers, process heaters or any combustion equipment that has a maximum heat input rate of 2,000,000 British thermal units (Btu) per hour (gross) or less and

is equipped to be heated exclusively with natural gas, methanol, liquefied petroleum gas or any combination thereof that does not include piston-type internal combustion engines.

Keep in mind that a press may be exempt based on the material usage while the associated drying equipment may require a permit based on its Btu rating. The exemption status of the drying equipment based on (b)(2) does not affect the exemption status of the printing or coating equipment. Also, please remember that the exemptions in Rule 219 do not apply to equipment emitting toxic compounds subject to Rule 1401 - New Source Review of Carcinogenic Air Contaminants.

During an inspection, an Air Quality Inspector may identify permitted equipment, which no longer requires a permit due to the changes in Rule 219. The Inspector must confirm that the equipment is exempt based on usage and/or emission records. Remember that for equipment to be exempt it must comply with the exemption levels on every day of operation. The company representative must be consulted and agree to the inactivation of the permit or the cancellation of the application. Some companies may want to maintain their permit even if the equipment qualifies for an exemption.

To recommend the inactivation of a permit or cancellation of an application, the following steps must be accomplished:

- a. Determine which section of Rule 219 applies.
- b. Review the usage record charts to determine the highest emission rate per day, or the type and highest amount of material used on a per day basis.
- c. If usage or emission rate qualifies equipment for exemption, collect copies of usage records showing highest usage amount or rate of emission.
- d. For boilers, process heaters or any combustion equipment check maximum heat input in Btu (include in equipment description).
- e. If the equipment is exempt and the permittee/applicant concurs, complete the attached Form 219A (Inactivation of Permit or Cancellation of Application) and have the company representative sign on the space provided.
- f. Submit the form and usage records (at least two-week's worth) to your supervisor for review and signature.
- g. For inactivation of a permit, the supervisor shall forward the completed form to Barbara Irby, Permit Services, Diamond Bar.
- h. For cancellation of an application, the supervisor shall forward the completed form to Van Phan at Diamond Bar.

If you have any questions or comments, please call me at x2576.

cc: Lee Lockie
Barbara Irby

FL:mr:219m1:03/23/93



INACTIVATION OF PERMIT-TO-OPERATE OR
CANCELLATION OF APPLICATION FOR PERMIT-TO-OPERATE
Pursuant to Amended Rule 219 Dated September 11, 1992

COMPANY INFORMATION

Company Name _____ AEIS ID _____
Equipment Address _____
Mailing Address _____
Contact Name _____ Tel. No. _____

EQUIPMENT FOR INACTIVATION OR CANCELLATION

P/O or Appl #	Equipment Description	Rule 219*	Highest Usage	Highest Emission

*Applicable Section(s) of Rule 219

_____ COMPANY REPRESENTATIVE	_____ SIGNATURE	_____ DATE
_____ INSPECTOR NAME	_____ SIGNATURE	_____ DATE
_____ REVIEWING SUPERVISOR	_____ SIGNATURE	_____ DATE

219A:03/23/93